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July 8, 2004

Electronically Filed

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: ***Ex Parte* Presentation**
ET Docket No. 04-37, Amendment of Part 15 regarding new requirements and
measurement guidelines for Access Broadband over Power Line Systems

Dear Ms. Dortch:

This is to notify you that on July 7, 2004, Larry Yonge, Jim Mollenkopf, Paul Schomburg and the undersigned, on behalf of the HomePlug Alliance, made an *ex parte* presentation to Bruce Franca, Bruce Romano, Anh Wride, Rashmi Doshi, Steve Martin and William Hurst, of the Office of Engineering and Technology, to discuss issues raised in the above-referenced proceeding.

The HomePlug Alliance discussed the issues addressed in the attached presentation and its Comments filed earlier in this proceeding.



In accordance with Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, this letter is being filed in the above docket and sent by email to the FCC participants.

Very truly yours,



David R. Siddall
Counsel to the HomePlug Alliance



DRS:dfr
Enclosure



HomePlug Meeting with FCC OET

7 July 2004

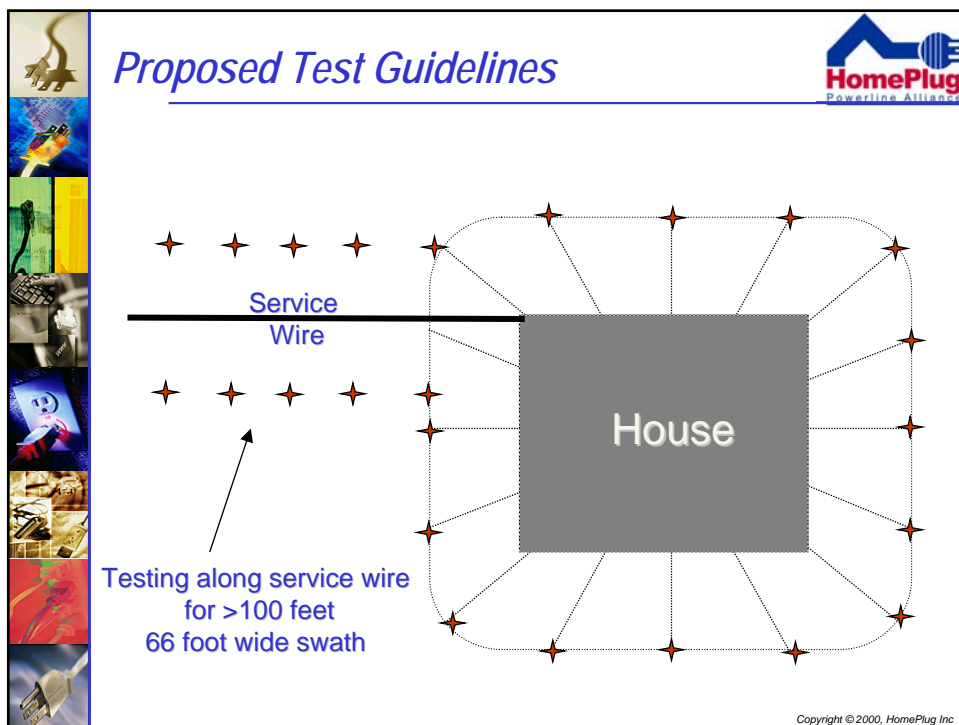
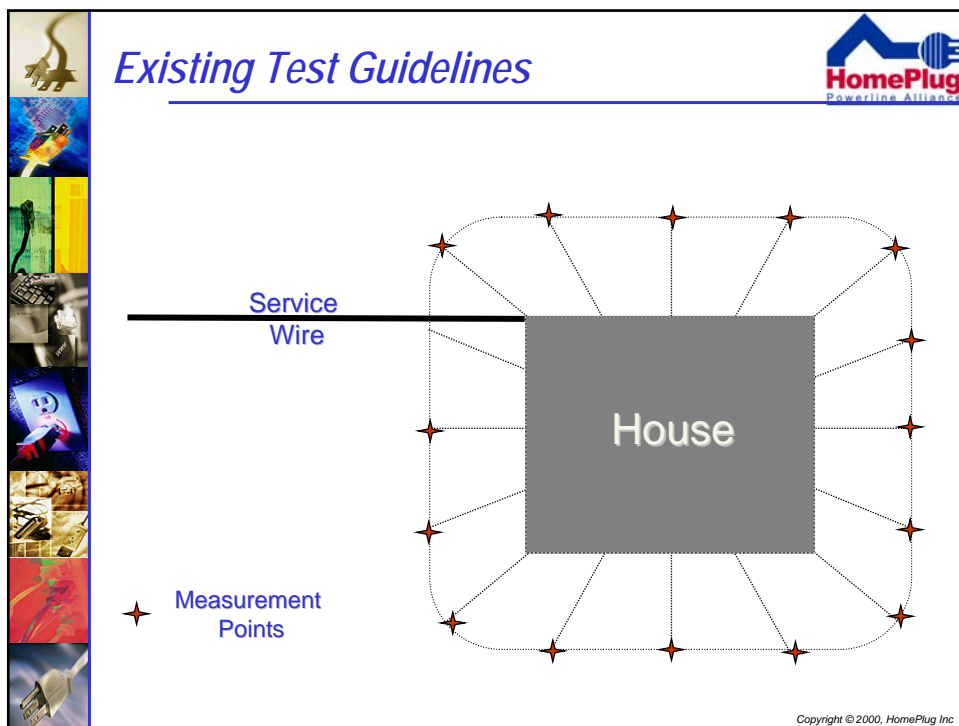
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HomePlug's Primary Points in Nol and NPRM Filings


- **HomePlug does not seek heavy regulation from FCC – certainty more important**
 - HomePlug applauds the quick move to NPRM
- **Part 15 limits should remain unchanged**
- **HomePlug agrees with in-situ verification of powerline aspects of HomePlug devices**
- **We do not agree with testing of In-House devices along the service lines leading up to a house**
 - Ask that this requirement be deleted

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Proposed Test Guidelines (cont'd)




- **Proposed test guidelines greatly limit the number of test sites available**
 - The requirement for length of service wire and width of swath not at all common in residential environments
 - These environments are the most typical deployments
- **No evidence in the Proceeding suggesting any radiation from service wires due to In-House BPL devices**
- **Compliance testing of In-House BPL devices reveals signal well into noise floor at 30m distance**
- **Proposal serves little purpose but increases burden on industry**

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In-House and Access Co-Existence



- **Access/In-House coexistence is a potential issue of concern to entire BPL industry**
- **Industry believes it is best positioned to address this issue**
 - HomePlug working on this within multiple working groups
 - HomePlug includes both In-House and Access companies
 - HomePlug also reaching out to Access specific organizations
- **HomePlug does not seek action from the Commission on coexistence issues at this time**
 - Industry would like an opportunity to attempt to address these issues

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Thank You

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